



**U.S. Environmental Protection Agency**  
Office of Waste Programs Enforcement  
Contract No. 68-W9-0006

# **TES 9**

**Technical Enforcement Support  
at Hazardous Waste Sites  
Zone III  
Regions 5,6, and 7**

***PRC***

**PRC Environmental Management, Inc.**



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**CLIFF DORION FACILITY  
(A.K.A. CLIFFS CONTAINER FACILITY)  
ROMEOVILLE, ILLINOIS  
ILD 000 768 481**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	ILD 000 768 481
Date Prepared	:	September 3, 1993
Contract No.	:	68-W9-0006
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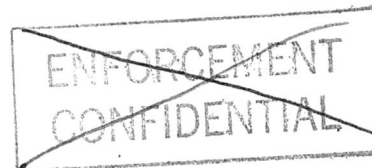
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**EXECUTIVE SUMMARY**



Dynamac Corporation (Dynamac), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Cliff Dorion facility, (A.K.A. the "Cliffs Container" (CC) facility), in Romeoville, Will County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

From the early 1970s to the early 1980s, the facility was a drum restoration business providing a drum recycling service to off-site customers. Mr. Cliff Dorion, the facility owner, said he picked up empty 55-gallon drums from off-site customers. Some of the drums contained residual amounts of their former contents. Operations included transporting the drums to the facility, washing them in a caustic solution in the Wash Bath (SWMU 5), rinsing them with water, and then selling them to off-site customers. According to Mr. Dorion, if the empty drums formerly contained an ignitable product, the ignitable drum residuals were combined with diesel fuel and burned in the Furnace (SWMU 4) used to heat the facility building.

According to Mr. Dorion, the facility stopped washing and rinsing drums in the early 1980s. Since that time the facility has only been buying, selling, and transporting empty drums. The majority of the drums managed at the facility since the early 1980s formerly contained food products such as dairy products, molasses, vinegar, and fruit juices. Although some of these drums contain residual amounts of their former contents, they are not washed prior to being sold to off-site customers.

From the early 1970s to the early 1980s, the facility operated under the name "Cliffs Container" (CC). Since the mid-1980s, the facility has been operating under the name "PKG Container Corporation" (PKG). According to the Illinois Secretary of State Bureau of Corporations CC and PKG are not registered corporations in Illinois; therefore, this report refers to the facility as the Cliff Dorion facility.

According to Mr. Dorion, the facility has not generated or managed any hazardous waste since the early 1980s. Since the early 1980s, the only waste managed at the facility has been nonhazardous empty drums. Hazardous waste generated or managed at the facility in the past include the following: ignitable drum residuals (F001, F002, F003, F005, U002, U112, U113, U140, U159, U220, U239); spent caustic solution (D002); and rinse water (D002). During the VSI, Dynamac did not observe any drums or other containers labelled hazardous waste or containing residual amounts of solvents. Drums observed during the VSI were empty and labelled as formerly containing food-related products, including yeast and dairy products.

The facility occupies 26,250 square feet in a primarily industrial area in Romeoville, Illinois. The facility was occupied by a hotel when Mr. Dorion purchased the facility in the

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early 1970s. According to Mr. Dorion, he has been the sole employee at the facility since that time.

Mr. Dorion submitted a Notification of Hazardous Waste Activity (Notification) to EPA on July 24, 1980; this Notification identified the facility as a generator of hazardous waste, but did not list any hazardous wastes. Mr. Dorion submitted a revised Notification to EPA on September 15, 1980; the revised Notification identified the facility as a treatment, storage or disposal (TSD) facility only, and listed the facility as managing the following hazardous wastes: unspecified spent halogenated solvents (F001, F002); unspecified non-halogenated solvents (F003, F005); acetone (U002); ethyl acetate (U112); ethyl acrylate (U113); isobutyl alcohol (U140); MEK (U159); toluene (U220); xylene (U239); slop oil emulsion solids from the petroleum refining industry (K049); and washes and sludges from the formulation of ink that contain chromium and lead (K086).

Mr. Dorion submitted a Part A permit application (Part A) on September 23, 1980, identifying the facility as a generator of hazardous waste and storage facility. The Part A listed the following process code and capacities: two tank storage (S02) units each with a 500-gallon capacity. The S02 codes referred to the two 500-gallon USTs located in the Wastewater Holding Area (SWMU 3). The Part A also listed the facility as handling approximately 500 gallons per year of each of the following waste codes: U002, U112, U113, U140, U159, U220, and U239. According to Mr. Dorion, these wastes were collected from empty drums that contained ignitable residuals, combined with diesel fuel, and burned in the Furnace (SWMU 4) used to heat the building. These wastes were therefore not managed by SWMU 3.

Mr. Dorion did not submit a closure plan for SWMU 3 and there is no documentation of closure activity at the facility. On October 29, 1988, Mr. Dorion submitted a request to IEPA that the Part A be withdrawn; the request indicated that the facility did not treat, store (for greater than 90 days), or dispose of hazardous waste after November 19, 1980. Although there is no documentation in EPA and IEPA files regarding a response to the facility's request to withdraw the Part A, the facility is currently regulated as a non-handler of hazardous waste.

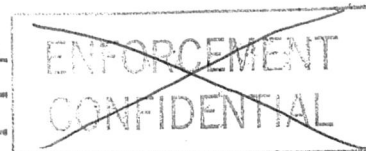
The PA/VSI identified the following 5 SWMUs at the facility. The PA/VSI did not identify any AOCs at the facility.

#### Solid Waste Management Units

1. Front Drum Storage Area
2. Rear Drum Storage Area
3. Wastewater Holding Area
4. Furnace
5. Wash Bath



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The potential for a release to ground water, surface water, on-site soils, or air from SWMUs 1 and 2 is high. The units are located outdoors and are used for the storage of empty drums that contain undocumented amounts of their former contents. The drums are stored open and on their sides on gravel or unbermed concrete. Ground water is encountered at approximately 5 feet below ground surface (bgs) and surface water runoff from the units discharges to the Des Plaines River. Facility access is not restricted by a fence or security system. Because prior to the early 1980s many of the empty drums formerly contained hazardous constituents, there is a high potential that hazardous constituents impacted environmental media in the past. According to Mr. Dorion, no drums containing hazardous waste residue were managed at the facility since the early 1980s. Therefore the potential impact of a future release from these units is low.

The potential for a past release from SWMU 3 to have impacted ground water, surface water, or on-site soils is high. This unit was used for the collection of rinse water (D002) generated at the facility. From the early 1970s to about 1980, rinse water was discharged to an unlined pit in this unit. In about 1980, the facility installed two interconnected steel underground storage tanks (UST) in the unlined pit; the USTs were also used for the collection of rinse water (D002). Ground water is encountered at approximately 5 feet bgs and the unlined pit and the USTs discharged to the Des Plaines River. The facility did not conduct any treatment of the rinse water (D002) and did not have a National Pollutant Discharge Elimination System (NPDES) permit.

The potential for a past release to air from SWMU 3 is moderate. SWMU 3 managed rinse water generated during cleaning of drums containing volatile hazardous waste. From the early 1970s to the early 1980s, SWMU 3 consisted of an unlined, open pit. Rinse water samples taken at SWMU 3 by an EPA contractor in 1984 revealed a pH of 12.8 and elevated levels of lead, zinc, and chromium; however, no elevated levels of volatile substances were detected at that time. The potential for a future release to environmental media from SWMU 3 is low because the unit has been inactive since washing operations ceased at the facility in the early 1980s.

The potential for a past release from SWMU 5 to have impacted ground water, surface water, on-site soils, or air is low. The unit was constructed of steel and was located indoors on a concrete floor. The unit contained a caustic solution used to wash empty drums. Hazardous rinse water (D002) generated by this unit was discharged to the Wastewater Holding Area (SWMU 3).

The potential for a release to ground water, surface water, on-site soils, or air from the Furnace (SWMU 4) cannot be assessed. From about 1978 to the early 1980s the facility collected ignitable drum residuals (F001, F002, F003, F005, U002, U112, U113, U140, U159, U220, and U239) and burned them in the Furnace (SWMU 4) to heat the building. Although the unit was located indoors on a concrete floor, it was situated adjacent to a floor drain that discharged to the Wastewater Holding Area (SWMU 3); SWMU 3 discharged to the Des Plaines River. The unit was removed from the facility in the mid-1980s. The

facility did not have an air operating permit and information regarding the construction and capacity of this unit was not available at the time of the VSI.

The facility is located on an island, approximately 4 acres in area, within the Des Plaines River, the nearest surface water body. The Des Plaines River is used primarily for transportation and for industrial and municipal discharges. Surface water runoff at the facility is to the west to the Des Plaines River.

Romeoville obtains its municipal water from a total of nine wells. The nearest municipal wells are located approximately 1.5 miles west of the facility. The municipal wells range in depth from 150 to 1,500 feet. Six of the wells draw from the shallow bedrock aquifer and three wells draw from the deep bedrock aquifer. Area residences located outside the city limits of Romeoville are supplied by private wells drawing from the shallow bedrock aquifer. The nearest private well is located approximately 0.5 mile west of the facility. Depth to ground water at the facility is approximately 5 feet bgs corresponding to the elevation of the Des Plaines River, a local ground water discharge zone. In addition, there is also a well located in the forest preserve area approximately 200 feet west of the facility. According to Mr. Dorion, this well is often used for drinking water.

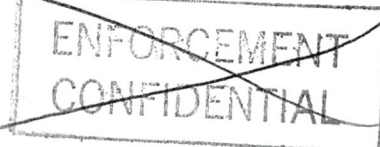
The nearest school, Lockport West High School, is located approximately 1.25 miles southwest of the facility. The nearest residence is located adjacent to the southern border of the facility. Facility access is not restricted by a fence or security system, but the facility building is kept locked when not occupied.

The nearest downstream sensitive environment, located about 0.1 mile southwest of the facility, is a 15-acre seasonally-flooded, forested wetland. There are approximately 40 other sensitive environments located within 2 miles downstream of the facility. These include about 15 additional seasonally-flooded, forested wetlands, ranging in size from 5 to 25 acres; about 15 seasonally- and temporarily-flooded wetlands with emergent vegetation, ranging in size from 2 to 30 acres; and about 10 intermittently exposed, excavated ponds with unconsolidated bottoms, each about 5 acres in size.

Dynamac recommends that the facility conduct soil sampling for volatile organic compounds (VOC) and heavy metals in the gravel area and unlined pit associated with SWMU 1. Dynamac recommends that the facility conduct soil sampling for VOCs and heavy metals in the vicinity of the concrete pad associated with SWMU 2. Dynamac also recommends that the facility conduct sediment sampling for the above listed parameters in the Des Plaines River where SWMUs 1 and 2 discharge to the river. The facility should also continue to monitor all drums brought to the facility and inspect SWMUs 1 and 2 to verify no drums with hazardous waste residue are present. If detected, such drums should be immediately closed and transported off-site to an appropriate RCRA-permitted treatment, storage, or disposal (TSD) facility.

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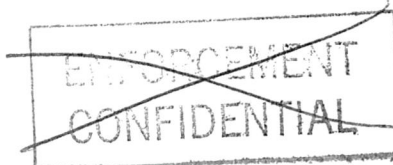


Dynamac also recommends that the facility conduct RCRA closure activities associated with SWMU 3. The RCRA closure activities should include soil sampling for VOCs and heavy metals in the vicinity of the USTs and sediment sampling for the same parameters where the USTs discharged to the Des Plaines River.

If soil or sediment sampling described above reveal contamination, Dynamac recommends that groundwater samples also be taken and analyzed to determine if groundwater quality has been affected.

Dynamac recommends no further action for SWMUs 4 and 5.

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## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Cliff Dorion facility (also known as the "Cliffs Container" (CC) facility), in Romeoville, Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition applies to the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.



The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other information needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Cliff Dorion facility, also known as the "Cliffs Container" facility, (EPA Identification No. ILD 000 768 481) in Romeoville, Will County, Illinois. The PA was completed on September 3, 1992. Dynamac gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) offices in Springfield, Illinois, and from EPA Region 5 RCRA files. In addition, Dynamac gathered information from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of the Interior (USDI), and the U.S. Geological Survey (USGS).

Valerie Farrell and Joseph Weslock of Dynamac conducted the VSI on February 4, 1993. It included an interview with Mr. Cliff Dorion, the facility owner, and a walk-through inspection of the facility. Dynamac identified five SWMUs and no AOCs at the facility.

The VSI is summarized and eight inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

### **2.1 FACILITY LOCATION**

The Cliff Dorion facility is located at 525 East 135th Street, in Romeoville, Will County, Illinois. Figure 1 shows the location of the facility in relation to surrounding topographic features (latitude 41° 36' 10" N and longitude 88° 04' 03" W)(USGS, 1962a; and USGS, 1962b). The facility occupies 26,250 square feet in a primarily industrial area.

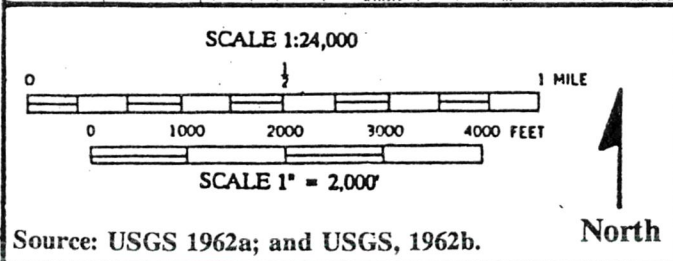
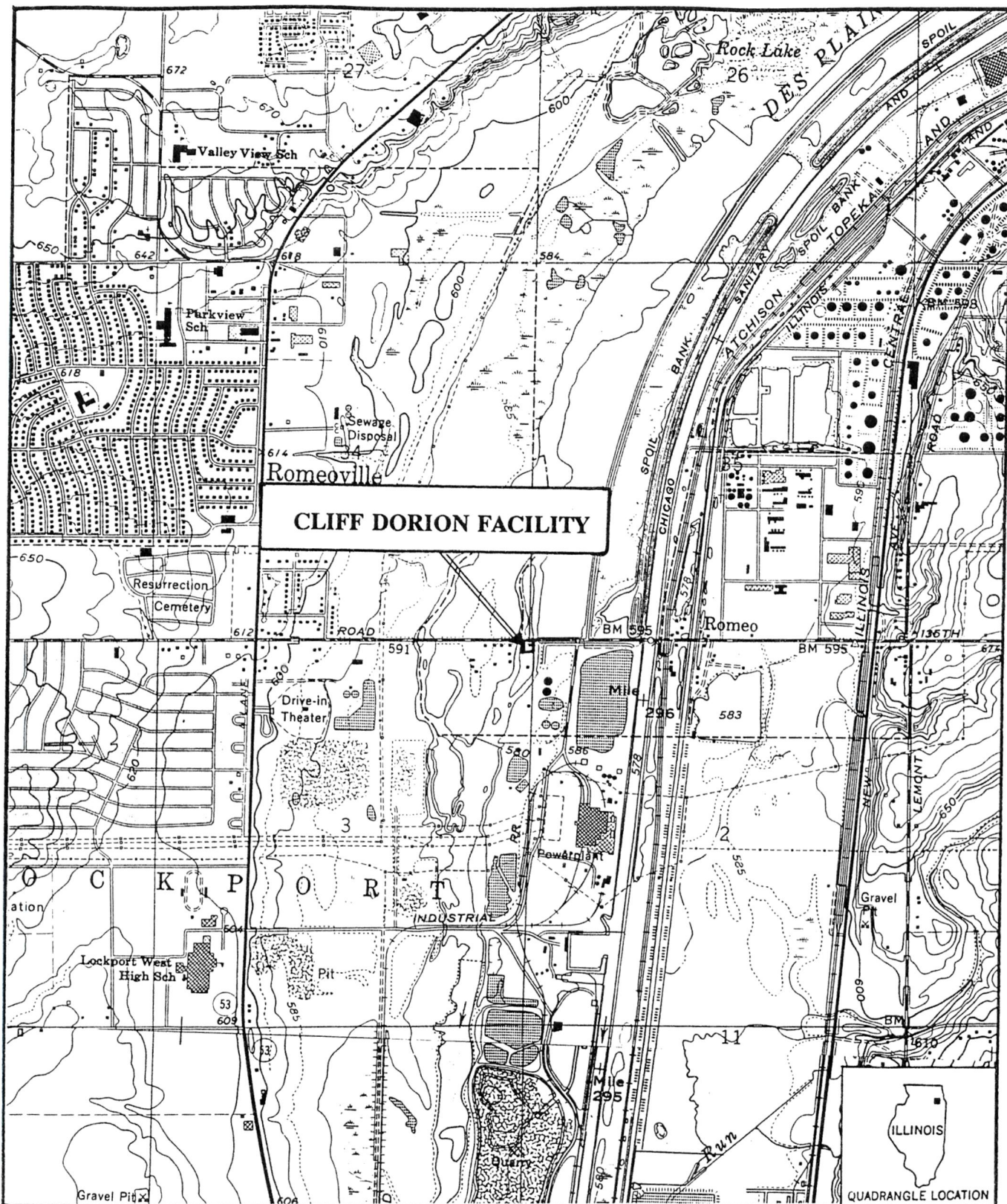
The facility is located on an island, approximately 4 acres in area, in the Des Plaines River. The facility is bordered on the west by a branch of the Des Plaines River followed by a forest preserve and a museum; on the east by a branch of the Des Plaines River followed by a Commonwealth Edison Power Plant; on the north by 135th Street followed by a convergence of the Des Plaines River branches; and on the south by a residence.

### **2.2 FACILITY OPERATIONS**

From the early 1970s to the early 1980s, the facility was a drum restoration facility providing a drum recycling service to off-site customers. Mr. Cliff Dorion picked up empty 55-gallon drums from off-site customers; some of the empty drums contained residual amounts of their former contents. Operations included transporting the drums to the facility, washing them in a caustic solution in the Wash Bath (SWMU 5), rinsing them with water, and then selling them to off-site customers. According to Mr. Dorion, if the empty drums formerly contained an ignitable product, the ignitable drum residuals were combined with diesel fuel, and burned in the Furnace (SWMU 4) used to heat the facility building. The caustic solution (raw material) used to wash the drums was stored in 55-gallon drums inside the building. The facility maintained two 500-gallon underground storage tanks (UST) located in the Wastewater Holding Area (SWMU 3), for the accumulation of rinse water (D002) generated at the facility.

According to Mr. Dorion, the facility stopped washing and rinsing drums in the early 1980s. Since that time the facility has only been buying, selling, and transporting empty drums. The majority of the drums managed at the facility since the early 1980s formerly contained food products such as dairy products, molasses, vinegar, and fruit juices. Although some of these drums contain residual amounts of their former contents, they are not washed prior to being sold to off-site customers. Mr. Dorion also stated that the facility occasionally accepts a few drums that formerly contained isopropanol, but do not contain any residuals. There were no former isopropanol drums on-site at the time of the VSI; therefore, Dynamac could not confirm this statement. At the time of the VSI, the only waste generated or managed at the facility is nonhazardous empty drums.





**FIGURE 1**  
**FACILITY LOCATION**  
**CLIFF DORION FACILITY**  
**ROMEIOVILLE, ILLINOIS**



From the early 1970s to the early 1980s, the facility operated under the name "Cliffs Container" (CC). Since the mid-1980s, the facility has been operating under the name "PKG Container Corporation" (PKG). According to the Illinois Secretary of State Bureau of Corporations CC and PKG are not registered corporations in Illinois; therefore, this report refers to the facility as the Cliff Dorion facility.

The facility was occupied by a hotel when Mr. Dorion purchased it in the early 1970s. Mr. Dorion conducted operations in the old hotel building until 1977, when the building was destroyed in a fire. In 1978, Mr. Dorion constructed the new facility building. According to Mr. Dorion, he has been the sole employee at the facility since that time. The facility currently consists of one building, two outdoor drum storage areas (the Front Drum Storage Area (SWMU 1), and the Rear Drum Storage Area (SWMU 2)), and gravel parking areas. Information regarding when the hotel began operations was not available in EPA or IEPA files or from Mr. Dorion at the time of the VSI.

Mr. Dorion does not keep any records or files concerning the facility operations. Therefore, information regarding current and historic operations at the facility was obtained from EPA and IEPA files and verbally from Mr. Dorion during the VSI. Dynamac notes that the information obtained from Mr. Dorion is limited and sometimes contradicts available file information (see Regulatory History, Section 2.5).

Solid wastes generated from facility operations and SWMUs where they are managed are discussed in detail in Section 2.3.

### **2.3 WASTE GENERATION AND MANAGEMENT**

Waste is generated and managed at various locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs in relation to the facility layout are shown in Figure 2. Waste generated at the facility is summarized in Table 2. Facility generation and management of both hazardous and nonhazardous waste is discussed below.

According to Mr. Dorion's Notification of Hazardous Waste Activity (Notification) and Part A permit application (Part A), the facility generated or managed the following hazardous waste: ignitable drum residuals (D001, F001, F002, F003, F005, U002, U112, U113, U140, U159, U220, U239); spent caustic solution (D002); and rinse water (D002) (CC, 1980b; and CC, 1980c). According to Mr. Dorion, the facility has not generated or managed any hazardous waste since the early 1980s. Since the early 1980s, the only waste managed at the facility has been nonhazardous empty drums. During the VSI, Dynamac did not observe any drums or other containers labelled hazardous waste or containing residual amounts of solvents. Drums observed during the VSI were empty and labelled as formerly containing food-related products, including yeast and dairy products.

**TABLE 1**  
**SOLID WASTE MANAGEMENT UNITS**

<b>SWMU Number</b>	<b>SWMU Name</b>	<b>RCRA Hazardous Waste Management Unit<sup>a</sup></b>	<b>Status</b>
1	Front Drum Storage Area	No	Active
2	Rear Drum Storage Area	No	Active
3	Wastewater Holding Area	Yes <sup>b</sup>	Inactive since early 1980s; Not RCRA closed
4	Furnace	No	Inactive since early 1980s
5	Wash Bath	No	Inactive since early 1980s

Notes:

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

<sup>b</sup> Although this unit was identified on the facility's Part A as a RCRA hazardous waste management unit, it did not undergo RCRA closure activities.



## **VISUAL SITE INSPECTION SUMMARY**

**CLIFF DORION FACILITY  
525 EAST 135th STREET  
ROMEOVILLE, ILLINOIS 60441  
ILD 000 768 481**

Date: February 4, 1992

Primary Facility Representative: Mr. Cliff Dorion, Owner

Representative Telephone No.: (815) 886-1033

Inspection Team: Valerie Farrell, Dynamac Corporation  
Joseph Weslock, Dynamac Corporation

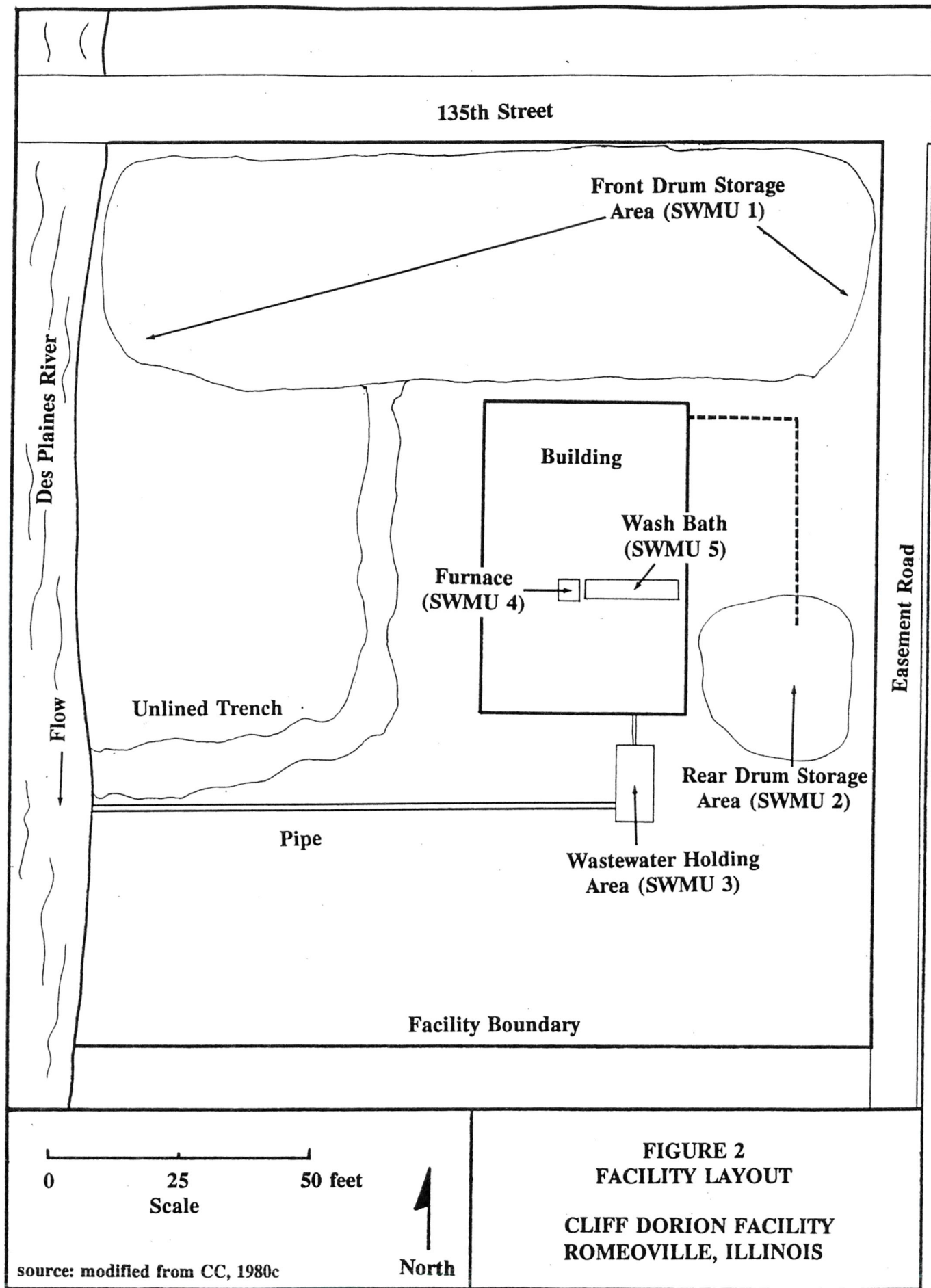
Photographer: Joseph Weslock, Dynamac Corporation

Weather Conditions: Sunny, approximately 45° Fahrenheit

Summary of Activities: The visual site inspection (VSI) began at 1:00 p.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Mr. Dorion, the facility owner, then discussed the facility's current and past operations, solid wastes generated, and release history. According to Mr. Dorion, the facility does not currently generate any wastes. Current facility operations consist of buying, selling, and transporting empty 55-gallon drums.

The VSI tour began at approximately 1:15 p.m. The inspection team first walked through the building and observed the Wash Bath (SWMU 5) and the area where the Furnace (SWMU 4) was formerly located. The inspection team then walked outside and observed the Front Drum Storage Area (SWMU 1), the Wastewater Holding Area (SWMU 3), and the Rear Drum Storage (SWMU 2).

The tour concluded at approximately 2:30 p.m., after which the inspection team held an exit meeting with the facility owner. The VSI was completed and the inspection team left the facility at 2:35 p.m.



**TABLE 2  
SOLID WASTES**

<b>Waste/EPA Waste Code</b>	<b>Source</b>	<b>Solid Waste Management Unit</b>
Ignitable Drum Residuals/ (F001, F002, F003, F005, U002, U112, U113, U140, U159, U220, and U239) <sup>a</sup>	Collected from empty drums (Discontinued)	4
Spent Caustic Solution/ (D002) <sup>a</sup>	Clean-out of Wash Bath (One-time waste)	3
Rinse water/ (D002) <sup>a</sup>	Rinsing washed drums (Discontinued)	3
Empty Drums/NA <sup>b,c</sup>	Off-site customers	1, 2, and 5

Notes:

- <sup>a</sup> Because the facility never conducted an analysis of these wastes it cannot be determined if additional waste codes also apply to these wastes. These waste codes were applied based on information obtained from the facility's Part A and from a 1984 CERCLA Site Inspection Report (CC, 1980c; and E & E, 1984).
- <sup>b</sup> Not applicable (NA) designates nonhazardous waste.
- <sup>c</sup> Some of these drums could have been considered as containing hazardous waste, depending upon the nature and amount of residue remaining. However, there is no documentation that these drums failed to meet the criteria specified in 40 CFR 261.7 that exempts drums with less than one inch of residue of the original contents from the definition of hazardous waste (CFR, 1990). Therefore, empty drums managed by Mr. Dorion are not considered a hazardous waste in this report.



Dynamac notes that prior to the early 1980s, Mr. Dorion accepted empty drums that contained residual amounts of substances with hazardous constituents, including ignitable solvents, lead and chromium. Some of these drums could have been considered as containing hazardous waste, depending upon the nature and amount of residue remaining. However, there is no documentation that these drums failed to meet the criteria specified in 40 CFR 261.7 that exempts drums with less than one inch of residue of the original contents from the definition of hazardous waste (CFR, 1990). Therefore, empty drums managed by Mr. Dorion are not considered a hazardous waste in this report.

From the early 1970s to the early 1980s, the facility generated ignitable drum residuals (F001, F002, F003, F005, U002, U112, U113, U140, U159, U220, U239), by emptying the small amount of ignitable residue from empty (but not cleaned) drums that were stored in the Front Drum Storage Area (SWMU 1) or the Rear Drum Storage Area (SWMU 2). The drums formerly contained halogenated or non-halogenated solvents (CC, 1980b; and CC, 1980c). Ignitable drum residuals were collected and mixed with diesel fuel prior to burning in the facility's Furnace (SWMU 4). Information regarding the methods and location of collection, and the quantity of ignitable drum residuals generated at the facility was not available in EPA or IEPA files or from Mr. Dorion at the time of the VSI. According to Mr. Dorion, the facility has not accepted drums containing ignitable drum residuals since the early 1980s.

The facility generated approximately 200 gallons of spent caustic solution (D002) during a one-time cleaning of the Wash Bath (SWMU 5). Prior to the early 1980s, Mr. Dorion washed empty drums in the Wash Bath prior to selling the cleaned drums to off site customers. As noted previously, some of these drums contained residual amounts of hazardous substances, including ignitable solvents, lead, and chromium. When Mr. Dorion ceased washing and cleaning drums in the early 1980s, he discharged the spent caustic solution (D002) to a floor drain which lead to the Wastewater Holding Area (SWMU 3). SWMU 3 discharged via a pipe to the Des Plaines River. Dynamac has identified this waste as D002 because Mr. Dorion described the solution as a "caustic" wash, but notes that no waste analysis was conducted to identify all appropriate waste codes for this waste. Because empty drums containing residual amounts of lead and chromium were washed in the Wash Bath (SWMU 5), waste codes D007 and D008 may also apply.

From the early 1970s to the early 1980s, the facility generated rinse water (D002) from rinsing empty drums after being washed in the Wash Bath (SWMU 5). Mr. Dorion rinsed the washed empty drums inside the building and discharged the rinse water, via the floor drain, to the Wastewater Holding Area (SWMU 3); SWMU 3 discharged to the Des Plaines River. Mr. Dorion did not keep any records regarding the volume of rinse water generated. Although Mr. Dorion never analyzed the rinse water, sampling of rinse water in the two USTs in the Wastewater Holding Area (SWMU 3), conducted by an EPA contractor in 1984, found the water to have a pH of 12.8 and elevated total levels of heavy metals, including lead, zinc, and chromium (E&E, 1984). The report of the 1984 sampling did not quantify the Extraction Procedure Toxicity Test levels of heavy metals in the rinse

water; therefore, Dynamac could not determine whether the waste was also characteristically hazardous for lead, zinc, or chromium.

From the early 1970s to the present, the facility has managed nonhazardous empty drums. Mr. Dorion transported empty drums from off site customers to the facility. The drums are initially stored in the Front Drum Storage Area (SWMU 1) or the Rear Drum Storage Area (SWMU 2).

From the early 1970s to the early 1980s, the facility washed the empty drums in the Wash Bath (SWMU 5), and then rinsed the drums prior to selling them to off site customers. The facility has not washed or rinsed empty drums since the early 1980s. Since that time Mr. Dorion has transported the empty drums to the facility, stored them at the Front Drum Storage Area (SWMU 1) or the Rear Drum Storage Area (SWMU 2) and then eventually shipped the empty drums off site for re-sale. The majority of the drums managed at the facility since the early 1980s formerly contained food products such as dairy products, molasses, vinegar, and fruit juices.

Mr. Dorion does not keep any records or files concerning facility operations and could not provide additional information describing the volume of empty drums managed by the facility.

## **2.4 HISTORY OF DOCUMENTED RELEASES**

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility. There was a documented release to surface water at the facility.

According to a August 1984 CERCLA Site Inspection Report, an EPA contractor collected water samples from the two USTs in the Wastewater Holding Area (SWMU 3). Analysis of the samples indicated that water in the USTs had a pH of 12.8 and elevated total levels of heavy metals including lead, zinc, and chromium. The Site Inspection Report did not quantify the total levels of heavy metals found in the water samples. In addition, the contractor observed overflow from SWMU 3 discharging to the Des Plaines River via a pipe (E & E, 1984). There is no documentation in EPA or IEPA files regarding subsequent sampling or remedial activities at the facility. In addition, Mr. Dorion stated that there has never been any remedial activity at the facility.

At the time of the VSI, Mr. Dorion stated that there was a fire at the facility in 1977 which destroyed the original facility building (the old hotel building). Additional information regarding the fire was not available in EPA or IEPA files or from Mr. Dorion at the time of the VSI.

File information also indicates that when the Des Plaines River rises, empty 55-gallon drums float into the river and Mr. Dorion has to fish them out (IEPA, 1982). At the time of the VSI, Mr. Dorion stated that the entire facility has been flooded in the past.



## 2.5 REGULATORY HISTORY

Mr. Dorion submitted a Notification to EPA on July 24, 1980; this Notification identified the facility as a generator of hazardous waste, but did not list any hazardous waste (CC, 1980a). Mr. Dorion submitted a revised Notification to EPA on September 15, 1980; the revised Notification identified the facility as a treatment, storage or disposal (TSD) facility only, and listed the facility as managing the following hazardous wastes: unspecified halogenated solvents (F001, F002); unspecified non-halogenated solvents (F003, F005); acetone (U002); ethyl acetate (U112); ethyl acrylate (U113); isobutyl alcohol (U140); MEK (U159); toluene (U220); xylene (U239); slop oil emulsion solids from the petroleum refining industry (K049); and washes and sludges from the formulation of ink that contain chromium and lead (K086) (CC, 1980b). Additional information regarding the generation and management of the K049 and K086 waste was not available in EPA or IEPA files; Mr. Dorion did not recall if these wastes were ever actually managed at the facility. The remainder of the wastes listed on the Notification were also identified on the facility's Part A.

Mr. Dorion submitted a Part A on September 23, 1980, identifying the facility as a generator of hazardous waste and storage facility. The Part A listed the following process codes and capacities: two tank storage (S02) units each with a 500-gallon capacity. The S02 codes referred to the two 500-gallon USTs located in the Wastewater Holding Area (SWMU 3). The Part A also listed the facility as handling approximately 500 gallons per year of each of the following waste codes: U002, U112, U113, U140, U159, U220, and U239 (CC, 1980c). According to Mr. Dorion, from 1978 to the early 1980s these wastes were collected from empty drums with hazardous residuals, combined with diesel fuel, and burned in the Furnace (SWMU 4). These wastes were therefore not managed by SWMU 3.

Mr. Dorion did not submit a closure plan for the Wastewater Holding Area (SWMU 3) and there is no documentation of closure activity at the facility. On October 29, 1988, Mr. Dorion submitted a request to IEPA that the facility's Part A be withdrawn; the request indicated that the facility did not treat, store (for greater than 90 days), or dispose of hazardous waste after November 19, 1980 (CC, 1988). Although there is no documentation in EPA and IEPA file information regarding a response to the facility's request to withdraw the Part A, the facility is currently regulated as a non-handler of hazardous waste (IEPA, 1988).

EPA conducted a RCRA inspection at the facility in December 1981. According to the inspection report, Mr. Dorion stated that he was a small-quantity generator of hazardous waste. However, EPA could not verify the status of the facility because Mr. Dorion did not conduct waste analysis or keep records of any waste generated or managed at the facility. The inspection report did not identify any violations at the facility (EPA, 1981).

IEPA conducted a RCRA inspection at the facility in March 1988, which indicated that the facility was not generating or managing any hazardous wastes at that time.



According to the inspection report, the facility was regulated as a "non-handler" of hazardous waste. Although the inspection report did not identify any violations at the facility, it did indicate that water from the USTs was being discharged via a pipe to the Des Plaines River (IEPA, 1988).

Although the facility maintained two USTs located in the Wastewater Holding Area (SWMU 3) and a Furnace (SWMU 4) used to burn hazardous waste, the facility did not have an air operating permit. There is no documentation in EPA or IEPA files regarding odor complaints from area residents.

Although the facility discharged rinse water (D002) to the Des Plaines River via an outfall from the USTs located in the Wastewater Holding Area (SWMU 3), the facility did not have a National Pollutant Discharge Elimination System (NPDES) permit.

There are two inter-connected 500-gallon steel USTs in the Wastewater Holding Area (SWMU 3) formerly used for the collection of rinse water (D002). According to Mr. Dorion, the USTs were installed around 1980 and were not registered with the Illinois State Fire Marshall. Dynamac notes that some information obtained verbally from Mr. Dorion regarding the USTs contradicts some information obtained from EPA and IEPA files. According to Mr. Dorion, although the USTs have been inactive since the early 1980s, they are still in place and have been filled with clean water. In 1984, an EPA contractor conducted a CERCLA Site Inspection at the facility. According to the Site Inspection Report, the contractor collected water samples from the two USTs in SWMU 3. Analysis of the samples indicated that the water in the USTs had a pH of 12.8 and elevated total levels of heavy metals. In addition, the contractor observed overflow from SWMU 3 discharging to the Des Plaines River via a pipe (E & E, 1984). In addition, in 1988 IEPA observed discharge from the USTs flowing into the Des Plaines River. Because IEPA did not collect water samples in 1988, it is not documented if the UST contained hazardous constituents at that time (IEPA, 1988).

The only documented Superfund (CERCLA) activity at the facility is a Site Inspection conducted by an EPA contractor in 1984. As described above, the Site Inspection revealed that the water in SWMU 3 contained a pH of 12.8 and elevated total levels of heavy metals including lead, zinc, and chromium. The report did not quantify the Extraction Procedure Toxicity Test levels of heavy metals in the water. There is no documentation in EPA or IEPA files regarding subsequent sampling or remedial activities at the facility. In addition, Mr. Dorion stated that there has never been any remedial activity at the facility.

## **2.6 ENVIRONMENTAL SETTING**

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

### **2.6.1 Climate**

The facility is located approximately 20 miles south of O'Hare International Airport, the nearest National Weather Service station. The climate in this area is continental with cold winters and warm summers. Lake Michigan, located approximately 18 miles east of the facility, has a moderating influence on temperature extremes. The average annual daily temperature is 49.2 degrees Fahrenheit (°F). The average daily temperature is highest in July at 73.0° F, and the average daily temperature is lowest in January at 21.4° F (NOAA, 1990).

Mean annual precipitation is 33.34 inches (NOAA, 1990). Mean annual lake evaporation is approximately 30 inches and net annual precipitation is approximately 3 inches. The one-year 24-hour maximum rainfall is approximately 2.4 inches (NOAA, 1979).

The prevailing wind is from the west-southwest. Average wind speed is highest in April at an average of 12 miles per hour from the west-southwest (NOAA, 1990).

### **2.6.2 Flood Plain and Surface Water**

The facility is located within the 100-year flood plain of the Des Plaines River (FEMA, 1991). The facility is located on an island within the Des Plaines River, the nearest surface water body. The Des Plaines River is used primarily for transportation and for industrial and municipal discharges (Dynamac, 1992a).

During December 1981 and March 1988 RCRA inspections at the facility, inspectors observed water from the USTs discharging via a pipe to the Des Plaines River (EPA, 1981; and IEPA, 1988). File information also indicates that when the Des Plaines River rises, empty 55-gallon drums float into the river and Mr. Dorion has to fish them out (IEPA, 1982). At the time of the VSI, Mr. Dorion stated that the entire facility has been flooded in the past.

### **2.6.3 Geology and Soils**

The soils of the facility are mapped as Romeo silt loam, and Joliet silt loam to silty clay loam. Romeo silt loam is a very thin (2 to 10 inches), poorly drained soil formed in alluvium resting on dolomite bedrock. Joliet silt loam to silty clay loam is thin (10 to 25 inches) poorly drained soil formed in alluvium resting on dolomite bedrock (UIAES, 1962). The owner of the facility has accepted gravel, soil, and other fill materials over the years to raise the surface of the island above the Des Plaines River.

There are only thin and scattered surficial deposits of alluvium and glacial outwash in the Des Plaines River Valley in the vicinity of the facility. The natural surficial deposits are less than 2 feet thick. The uppermost bedrock in the vicinity of the facility is dolomite of the Silurian-age Niagaran and Alexandrian Series. The upper Niagaran Series is



### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

#### **SWMU 1**

#### **Front Drum Storage Area**

##### **Unit Description:**

The Front Drum Storage Area consists of an outdoor gravel covered area and an unlined trench which leads to the Des Plaines River. The unit is used for the storage of empty drums (see Photo No. 1). According to Mr. Dorion, the gravel covered area does not have a defined size or capacity, but normally consists of an approximate 5,200 square foot area between the facility building and 135th street.

##### **Date of Startup:**

This unit began operation in the early 1970s.

##### **Date of Closure:**

This unit is currently active.

##### **Waste Managed:**

From the early 1970s to the present, this unit has managed empty drums received from off-site customers. Some of the empty drums contain residual amounts of their former contents. Prior to the early 1980s, the facility accepted empty drums that formerly contained products with hazardous constituents including ignitable solvents, lead, and chromium. Although some of these empty drums contained hazardous residuals, there is no documentation that these drums failed to meet the criteria specified in 40 CFR 261.7 that exempts drums with less than one inch of hazardous residue from the definition of hazardous waste.

Since the early 1980s, the unit has been used for the storage of empty drums received from off-site customers. The majority of these drums formerly contained food products such as dairy products, molasses, vinegar, and fruit juices. Although some of these drums contain residual amounts of their former contents, they are not washed prior to being sold to off-site customers.

##### **Release Controls:**

There are no release controls associated with this unit. This unit manages empty drums that contain residual amounts of their former contents. The drums are stored open and on their sides, and are stacked up to three high on a gravel area. There

is no fence or security at the facility. In addition, the unit contains an unlined trench which directs surface water runoff to the Des Plaines River (see Photo Nos. 7 and 8).

**History of  
Documented Releases:**

No releases from this unit have been documented. However, file information states that when the Des Plaines River rises, empty 55-gallon drums float into the river and Mr. Dorion has to fish them out (IEPA, 1982). Mr. Dorion stated that the entire facility has been flooded in the past.

**Observations:**

At the time of the VSI, the area where this unit is located was recently covered with fresh gravel and the unit contained approximately 160 empty drums. There were no stains or evidence of a previous release (see Photo No. 1).

**SWMU 2**

**Rear Drum Storage Area**

**Unit Description:**

The Rear Drum Storage Area consists of an unbermed concrete pad located outdoors along the east side of the building. The north and west sides of the unit are partially enclosed by a corrugated steel wall and approximately one-quarter of the unit is covered by a corrugated steel roof (see Photo No. 6). The unit is approximately 975 square feet in area and has the capacity to manage about 675 drums if they are stacked three high.

**Date of Startup:**

This unit began operation in the early 1970s.

**Date of Closure:**

This unit is currently active.

**Wastes Managed:**

From the early 1970s to the present, this unit has managed empty drums received from off-site customers. The empty drums contain residual amounts of their former contents. Prior to the early 1980s, the facility accepted empty drums that formerly contained products with hazardous constituents including ignitable solvents, lead, and chromium. Although some of these empty drums contained hazardous residuals, there is no documentation that these drums failed to meet the criteria specified in 40 CFR 261.7 that exempts drums with less than one inch of hazardous residue from the definition of hazardous waste.



The facility is bordered on the west by a branch of the Des Plaines River followed by a forest preserve and a museum; on the east by a branch of the Des Plaines River followed by a Commonwealth Edison Power Plant; on the north by 135th Street followed by a convergence of the Des Plaines River branches; and on the south by the nearest residence, a single family home. The nearest school, Lockport West High School, is located approximately 1.25 miles southwest of the facility. Facility access is not restricted by a fence or security system, but the facility building is kept locked when not occupied.

According to Mr. Dorion, the facility has not generated or managed any hazardous waste since the early 1980s. Since the early 1980s, the only waste managed at the facility has been nonhazardous empty drums. At the time of the VSI, empty drums formerly containing yeast and dairy products were being stored by the facility outdoors in the Front Drum Storage Area (SWMU 1) and the Rear Drum Storage Area (SWMU 2). Dynamac did not observe any drums or other containers labelled hazardous waste or containing residual amounts of solvents.

The facility is located on an island within the Des Plaines River, the nearest surface water body. The Des Plaines River is used primarily for transportation and for industrial and municipal discharges (Dynamac, 1992a). Surface water runoff at the facility is to the west of the Des Plaines River.

Romeoville obtains its municipal water from a total of nine wells. The nearest wells are located approximately 1.5 miles west of the facility. The municipal wells range in depth from 150 to 1,500 feet. Six of the wells draw from the shallow bedrock aquifer and three wells draw from the deep bedrock aquifer (Dynamac, 1993). Area residences located outside the city limits of Romeoville are supplied by private wells drawing from the shallow bedrock aquifer. The nearest private well is located approximately 0.5 mile west of the facility. There is also a well located in the forest preserve area approximately 200 feet west of the facility. According to Mr. Dorion, this well is often used as drinking water.

The nearest downstream sensitive environment, located about 0.1 mile southwest of the facility, is a 15-acre seasonally-flooded, forested wetland. There are approximately 40 other sensitive environments located within 2 miles downstream of the facility. These include about 15 additional seasonally-flooded, forested wetlands, ranging in size from 5 to 25 acres; about 15 seasonally- and temporarily-flooded wetlands with emergent vegetation, ranging in size from 2 to 30 acres; and about 10 intermittently exposed, excavated ponds with unconsolidated bottoms, each about 5 acres in size (USDI, Undated).

characterized by large massive reef complexes and nearly pure dolomite, with some argillaceous zones between the reefs. The lower Alexandrian Series is composed of well-bedded cherty and argillaceous dolomite (Willman, 1971). The total thickness of the Silurian dolomites in this area is approximately 250 feet (Hughes, Kraatz, and Landon, 1966).

Underlying the dolomite is the Ordovician-age Maquoketa Shale. The Maquoketa Shale is red and oolitic near the top, and gray green, with some interbedded shaley limestone at depth. The Maquoketa Shale is underlain by several thousand feet of Ordovician-age and Cambrian-age dolomites and sandstones (Willman, 1971).

#### **2.6.4 Ground Water**

The two major aquifers in the area of the facility are a shallow bedrock aquifer and a deep bedrock aquifer. The shallow bedrock aquifer consists of the Silurian dolomite formations. The shallow bedrock aquifer is likely to be saturated up to the elevation of the Des Plaines River, a local ground water discharge zone. Regional ground-water flow in this aquifer is east and southeast and measured hydraulic conductivities average  $1 \times 10^{-4}$  centimeters per second (Hughes, Kraatz, and Landon, 1966). A deep bedrock aquifer is comprised of the Ordovician and Cambrian dolomites and sandstones underlying the Maquoketa Shale. The most productive formation within this aquifer is the Ironton-Galesville sandstone (Schict, Adams, and Stall, 1976). The Maquoketa Shale serves as a confining layer above the deep bedrock aquifer (Hughes, Kraatz, and Landon, 1966). Ground water flow direction in this aquifer is regionally to the east (Schict, Adams, and Stall, 1976).

Ground water at the facility is encountered at approximately 5 feet below ground surface (bgs). There is an on-site well at the facility drawing from a depth of about 80 feet bgs. This is a private industrial well completed in the shallow bedrock aquifer. There is also a well located in the forest preserve area approximately 200 feet west of the facility. According to Mr. Dorion, this well is often used as drinking water. Area residences located outside the city limits of Romeoville are supplied by private wells drawing from the shallow bedrock aquifer. The nearest private well is located approximately 0.5 mile west of the facility. Romeoville obtains its municipal water from a total of nine wells. The nearest wells are located approximately 1.5 miles west of the facility. The municipal wells range in depth from 150 to 1,500 feet. Six of the wells draw from the shallow bedrock aquifer and three wells draw from the deep bedrock aquifer (Dynamac, 1993).

#### **2.7 RECEPTORS**

The facility occupies 26,250 square feet in a primarily industrial area in Romeoville, Illinois, which has a population of approximately 15,000 people (Romeoville Village Hall, Undated).



Since the early 1980s, the unit has been used for the storage of empty drums received from off-site customers. The majority of these drums formerly contained food products such as dairy products, molasses, vinegar, and fruit juices. Although some of these drums contain residual amounts of their former contents, they are not washed prior to being sold to off-site customers.

**Release Controls:**

There are no release controls associated with this unit. The unit is located outdoors and there is no fence or security at the facility. This unit manages empty drums that contain residual amounts of their former contents. The drums are stored on an unbermed concrete pad and surface water runoff from the unit discharges to the Des Plaines River.

**History of  
Documented Releases:**

No releases from this unit have been documented. However, file information states that when the Des Plaines River rises, empty 55-gallon drums float into the river and Mr. Dorion has to fish them out (IEPA, 1982). Mr. Dorion stated that the entire facility has been flooded in the past.

**Observations:**

At the time of the VSI, the unit contained approximately 30 empty drums. There were no stains or evidence of a previous release on the concrete pad associated with this unit (see Photo No. 6).

**SWMU 3**

**Wastewater Holding Area**

**Unit Description:**

The Wastewater Holding Area was located on the south side of the building and was used for the collection of rinse water (D002) discharged from the building via the floor drain. From the early 1970s to about 1980, the unit consisted of an unlined pit approximately 250 cubic feet in size, and an unlined trench which discharged to the Des Plaines River. In about 1980, Mr. Dorion installed two inter-connected 500-gallon steel USTs in the unlined pit; the USTs were also used for the collection of rinse water (D002) discharged from the building via the floor drain. The USTs discharged to the Des Plaines River via a pipe.

**Date of Startup:**

This unit began operation in the early 1970s.

**Date of Closure:**

This unit has been inactive since washing operations ceased at the facility in the early 1980s. Although the USTs were

identified on the facility's Part A as RCRA hazardous waste management units, they did not undergo RCRA closure activities. During the VSI, Mr. Dorion stated that the USTs are still in place and have been filled with clean water.

**Wastes Managed:**

Rinse water (D002) generated from rinsing washed empty drums inside the building was discharged to this unit via the floor drain. Many of the empty drums contained volatile hazardous constituents.

An EPA contractor collected water samples from this unit during a 1984 CERCLA Site Inspection. According to the Site Inspection Report, the water contained a pH of 12.8 and elevated total levels of heavy metals including lead, zinc, and chromium. The report did not quantify the Extraction Procedure Toxicity Test levels of heavy metals in the water. In addition, this unit managed spent caustic solution (D002) generated from the Wash Bath (SWMU 5) when washing operations ceased at the facility in the early 1980s. This one-time waste was also discharged, via the floor drain, to this unit. This unit discharged to the Des Plaines River.

**Release Controls:**

There are no release controls associated with this unit. From the early 1970s to 1980, wastes were discharged into the unlined pit with an unlined trench that led to the Des Plaines River. In about 1980, the facility installed two 500-gallon inter-connected steel USTs. The USTs discharged to the Des Plaines River via a pipe. The facility does not have an NPDES permit for the discharge to the Des Plaines River.

**History of  
Documented Releases:**

During a 1984 CERCLA Site Inspection, the above referenced contractor observed overflow from this unit discharging to the Des Plaines River via a pipe (E & E, 1984). There is no documentation in EPA or IEPA files regarding subsequent sampling or remedial activities at the facility. In addition, Mr. Dorion stated that there has never been any remedial activity at the facility.

**Observations:**

Dynamac observed the area where the unlined pit was formerly located and the USTs are currently located (see Photo No. 3). The area was covered with gravel and the USTs were not visible. There was no visible evidence of a previous release. Dynamac also observed the outfall area near the Des Plaines

River; the surrounding area did not have any stains or evidence of a previous release.

#### **SWMU 4**

#### **Furnace**

**Unit Description:** According to Mr. Dorion, the facility operated a Furnace to heat the building from the early 1970s to the early 1980s. According to Mr. Dorion, he collected ignitable drum residuals, combined them with diesel fuel, and burned them in the Furnace. Information regarding the methods and location of collection was not available in EPA or IEPA files or from Mr. Dorion at the time of the VSI. The unit was located indoors on the east side of the building and was removed from the facility in the mid-1980s. Information regarding the construction and capacity of the unit was not available at the time of the VSI.

**Date of Startup:** This unit began operation in about 1978.

**Date of Closure:** This unit has been inactive since washing operations ceased at the facility in the early 1980s.

**Wastes Managed:** This unit was used to burn ignitable drum residuals (F001, F002, F003, F005, U002, U112, U113, U140, U159, U220, U239) that were combined with diesel fuel.

**Release Controls:** Although this unit was located indoors on a concrete floor, it was situated adjacent to a floor drain that discharged to the Wastewater Holding Area (SWMU 3); SWMU 3 discharged to the Des Plaines River. Information regarding additional release controls associated with this unit was not available in EPA or IEPA files or from Mr. Dorion during the VSI.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** Dynamac did not observe this unit during the VSI because it had been removed from the facility in the mid-1980s. The area where this unit was formerly located did not contain any stains or evidence of a previous release (See Photo No. 2).

#### **SWMU 5**

#### **Wash Bath**

**Unit Description:** The Wash Bath consists of a 135-cubic-foot open-topped, steel tank located on a concrete floor inside the building. The unit



formerly contained a caustic solution which was used to wash empty drums after the ignitable and volatile drum residuals had been collected and removed. According to Mr. Dorion, while the Wash Bath was in operation, the unit was never cleaned and the water was never changed. Additional caustic solution and water was added to the Wash Bath (SWMU 5) as necessary. When washing operations ceased at the facility in the early 1980s, the spent caustic solution (D002) in this unit was discharged via the floor drain, to the Wastewater Holding Area (SWMU 3). SWMU 3 discharged to the Des Plaines River.

Date of Startup:	This unit began operation in the early 1970s.
Date of Closure:	This unit has been inactive since washing operations ceased at the facility in the early 1980s.
Wastes Managed:	This unit was used to wash empty drums after the ignitable drum residuals had been removed.
Release Controls:	Although this unit was located indoors on a concrete floor and was constructed of steel, it was situated adjacent to a floor drain that discharged to the Wastewater Holding Area (SWMU 3); SWMU 3 discharged to the Des Plaines River.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	At the time of the VSI, this unit was inactive and empty; the area surrounding this unit did not contain any stains or evidence of a previous release (see Photo No. 2).

#### **4.0 AREAS OF CONCERN**

Dynamac did not observe any AOCs at the time of the PA/VSI.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and no AOCs at the facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are Dynamac's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and recommended further actions.

### SWMU 1

#### Front Drum Storage Area

##### Conclusions:

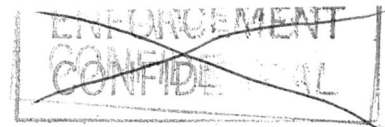
The unit consists of a gravel area and unlined trench located outdoors on the north and west sides of the facility. The unit is used for the storage of empty drums; some of the empty drums contain residual amounts of their former contents. Many of the drums are stored open and are stacked on their sides three high. From the early 1970s to the early 1980s, this unit managed empty drums that formerly contained substances with hazardous constituents including ignitable solvents, lead, and chromium. Since the early 1980s, the unit has been used for the storage of empty drums that formerly contained nonhazardous food products. The potential for a release to environmental media is summarized below.

There is a high potential for a release to all environmental media from this unit. Wastes are stored on a gravel area and ground water is encountered at approximately 5 feet bgs. The area is subject to flooding and the unlined trench directs surface water runoff to the Des Plaines River. The drums are stored open, on their sides, and are stacked up to three high. Some of the drums contain residual amounts of their former contents. Prior to the early 1980s, some of these drums formerly contained substances with ignitable and volatile hazardous constituents, therefore it is highly likely that hazardous constituents impacted environmental media in the past. Since the early 1980s, the unit has managed empty drums that formerly contained nonhazardous substances.

**Recommendations:** Dynamac recommends that the facility conduct soil sampling for volatile organic compounds (VOC) and heavy metals in the vicinity of the unit and the unlined trench and sediment sampling for the same parameters where the unlined trench discharges to the Des Plaines River. If soil is found to be contaminated, the facility should also



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conduct groundwater sampling to determine whether groundwater has been affected.

The facility should also continue to monitor all drums brought to the facility and inspect this unit to verify no drums with hazardous waste residue are present. If detected, such drums should be immediately closed and transported off-site to a permitted RCRA TSD facility for disposal.

## **SWMU 2**

### **Rear Drum Storage Area**

#### **Conclusions:**

The unit consists of an unbermed concrete pad located outdoors along the east side of the building used for the storage of empty drums; some of the empty drums contain residual amounts of their former contents. Many of the drums are stored open and on their sides. From the early 1970s to the early 1980s, this unit managed empty drums that formerly contained hazardous constituents. Since the early 1980s, the unit has been used for the storage of empty drums that formerly contained nonhazardous products. The potential for a release to environmental media is summarized below.

There is a high potential for a release to all environmental media from this unit. The unit is located on an unbermed concrete pad and ground water is encountered at approximately 5 feet bgs. The area is subject to flooding and surface water runoff from the facility discharges to the Des Plaines River. The drums are stored open and on their sides. Some of the drums contain residual amounts of their former contents. Prior to the early 1980s, some of these drums formerly contained substances with hazardous constituents, therefore it is highly likely that hazardous constituents impacted environmental media in the past. Since the early 1980s, the unit has managed empty drums that formerly contained nonhazardous substances.

**Recommendations:** Dynamac recommends that the facility conduct soil sampling for VOCs and heavy metals in the vicinity of the unit and sediment sampling for the same parameters in the Des Plaines River. If soil is found to be contaminated, the facility should also conduct groundwater sampling to determine whether groundwater has been affected.

The facility should also continue to monitor all drums brought to the facility and inspect this unit to verify no drums with hazardous waste residue are present. If detected, such drums should be immediately closed and transported off-site to a permitted RCRA TSD facility for disposal.

### **SWMU 3**

### **Wastewater Holding Area**

#### **Conclusions:**

The unit was located on the south side of the building and was used for the collection of rinse water (D002) generated from rinsing operations inside the building. From the early 1970s to about 1980, the unit consisted of an unlined pit and an unlined trench which discharged to the Des Plaines River. In about 1980, Mr. Dorion installed two inter-connected 500-gallon steel USTs in the unlined pit; the USTs were also used for the collection of rinse water (D002). The USTs discharged to the Des Plaines River via a pipe. Dynamac notes that the facility did not conduct a waste analysis for the rinse water (D002). Because empty drums containing residual amounts of lead and chromium were washed at the facility, waste codes D007 and D008 may also apply. The potential for a release to environmental media is summarized below.

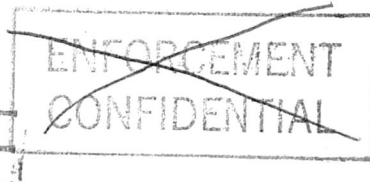
The potential for hazardous constituents to have impacted ground water, surface water and on-site soils in the past is high. From the early 1970s to about 1980, the facility discharged rinse water (D002) directly to on-site soils in the unlined pit. Ground water is encountered at approximately 5 feet bgs in the area. From about 1980 to the early 1980s, the facility discharged the rinse water to the two USTs which discharged to the Des Plaines River.

The potential for a past release to air is moderate. The rinse water (D002) managed by this unit was generated during rinsing of drums that formerly contained ignitable and volatile hazardous waste residue. Prior to about 1980, this SWMU managed waste in an open pit.

According to Mr. Dorion, this unit has been inactive since washing operations ceased at the facility in the early 1980s; therefore, the potential for a future release to environmental media from this unit is low.

**Recommendations:** Dynamac recommends that the facility conduct RCRA closure for this unit. The RCRA closure should include soil sampling for VOCs and heavy metals in the vicinity of the unit and sediment sampling for the same parameters where the surface water runoff from the unit discharges to the Des Plaines River. If soil or sediment is found to be contaminated, the facility should also conduct groundwater sampling to determine whether groundwater has been affected.

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**SWMU 4****Furnace****Conclusions:**

From about 1978 to the early 1980s the facility collected ignitable drum residuals (F001, F002, F003, F005, U002, U112, U113, U140, U159, U220, and U239) and burned them with diesel fuel in the Furnace to heat the building. Although the unit was located indoors on a concrete floor, it was situated adjacent to a floor drain that discharged to the Wastewater Holding Area (SWMU 3); SWMU 3 discharged to the Des Plaines River. The unit was removed from the facility in the mid-1980s. Information regarding the construction and capacity of this unit was not available at the time of the VSI. Due to the lack of information regarding the construction and operation of this unit, the potential for a past release cannot be assessed.

**Recommendations:** Dynamac recommends no further action for this SWMU.

**SWMU 5****Wash Tank****Conclusions:**

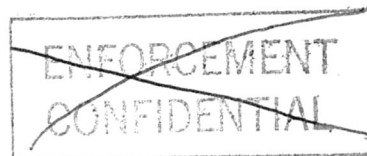
The unit consisted of an open-topped steel tank located indoors on a concrete floor. The unit contained a caustic solution used to wash empty drums at the facility and has been inactive since the early 1980s. When washing operations ceased at the facility in the early 1980s, the spent caustic solution (D002) in this unit was discharged, via the floor drain, to the USTs in the Wastewater Holding Area (SWMU 3). SWMU 3 discharged to the Des Plaines River. The potential for a release to environmental media is summarized below.

The potential for hazardous constituents to have impacted ground water, surface water, on-site soils in the past is low. This unit was constructed of steel and was located indoors on a concrete floor. When washing operations ceased at the facility in the early 1980s, the spent caustic solution (D002) from this unit was discharged to SWMU 3.

The potential for a release to the air from this unit in the past is high. This open-top unit was used to wash drums containing residual amounts of volatile and ignitible substances.

According to Mr. Dorion, this unit has been inactive since washing operations ceased at the facility in the early 1980s; therefore, the potential for a future release to environmental media from this unit is low.

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Recommendations: Dynamac recommends no further action for this SWMU. Dynamac has recommended soil and sediment sampling associated with SWMU 3, which would have been impacted by any past releases from this unit.

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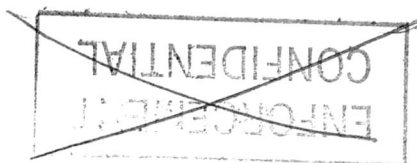
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**TABLE 3  
SWMU SUMMARY**

<b>SWMU</b>	<b>Dates of Operation</b>	<b>Evidence of Release</b>	<b>Recommended Further Action</b>
1. Front Drum Storage Area	Early 1970s to Present	Floating drums in river	Conduct soil and sediment sampling for VOCs and heavy metals. <sup>a</sup> Continue inspecting unit for drums containing hazardous waste residuals.
2. Rear Drum Storage Area	Early 1970s to Present	Floating drums in river	Conduct soil and sediment sampling for VOCs and heavy metals. <sup>a</sup> Continue inspecting unit for drums containing hazardous waste residuals.
3. Wastewater Holding Area	Early 1970s to Present	Observed release of water with elevated pH and heavy metals from this unit to the river	Conduct RCRA closure for this unit, including soil and sediment sampling for VOCs and heavy metals.
4. Furnace	1978 to early 1980s	None	None
5. Wash Bath	Early 1970s to early 1980s	None	None

Note:

<sup>a</sup> If soil or sediment sampling reveals contamination, Dynamac recommends the facility also conduct groundwater sampling to determine if groundwater has been affected.



OK  
6/15/00

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- USGS, 1962b. 7.5 Minute Series Topographic Map, Romeoville, Illinois Quadrangle, photorevised 1973 and 1980.
- Willman, H.B., 1971. "Summary of the Geology of the Chicago Area," Illinois State Geological Survey.

**ATTACHMENT A**

**VISUAL SITE INSPECTION SUMMARY  
AND PHOTOGRAPHS**

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**Photo No.:** 1  
**Orientation:** Northwest  
**Description:** Approximately 40 55-gallon plastic drums stored in the Front Drum Storage Area. These drums formerly contained yeast and other food products.

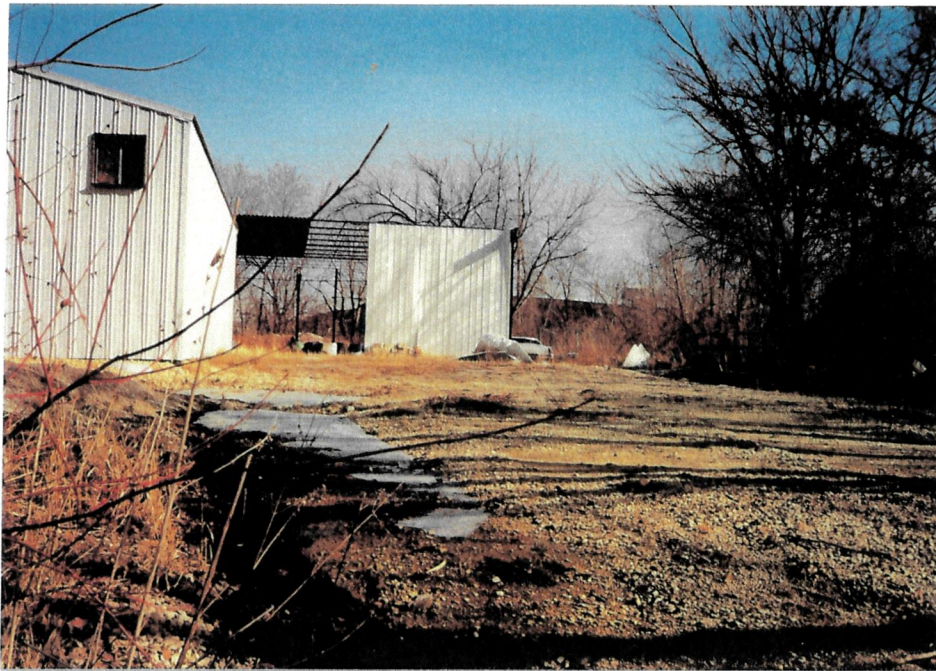
**Location:** SWMU 1  
**Date:** February 4, 1993



**Photo No.:** 2  
**Orientation:** East  
**Description:** The Wash Bath (SWMU 5) is located near center of photograph under the miscellaneous equipment and debris. The Furnace (SWMU 4) was formerly located in the area on the right side of the photograph.

**Location:** SWMUs 4 and 5  
**Date:** February 4, 1993





**Photo No.:** 3 **Location:** SWMU 3  
**Orientation:** East **Date:** February 4, 1993  
**Description:** Area along the south side of the building where SWMU 3 was located. According to the facility owner, the two 500-gallon steel underground storage tanks (UST) are still located in the area and have been filled with clean water.



**Photo No.:** 4 **Location:** SWMU 1  
**Orientation:** South **Date:** February 4, 1993  
**Description:** Approximately 40 55-gallon steel drums in the Front Drum Storage Area. These drums formerly contained dairy products and other food products.





**Photo No.:** 5 **Location:** North side of facility  
**Orientation:** Southeast **Date:** February 4, 1993  
**Description:** Truck located on north side of building containing 55-gallon steel drums.



**Photo No.:** 6 **Location:** SWMU 2  
**Orientation:** Northwest **Date:** February 4, 1993  
**Description:** Approximately 30 55-gallon steel drums located in the Rear Drum Storage Area. These drums formerly contained molasses and other food products.





**Photo No.:**  
**Orientation:**  
**Description:**

**7**

**North**

**Northern portion of the unlined trench that directs surface water runoff from SWMU 1 to the Des Plaines River.**

**Location: SWMU 1**  
**Date: February 4, 1993**



**Photo No.:**  
**Orientation:**  
**Description:**

**8**

**Northwest**

**Southern portion of the unlined trench that directs surface water runoff from SWMU 1 to the Des Plaines River.**

**Location: SWMU 1**  
**Date: February 4, 1993**



**ATTACHMENT B**

**VISUAL SITE INSPECTION  
FIELD NOTES**

FEBRUARY 4, 1993

CLIFF'S CONTAINERS  
525 E 135<sup>TH</sup> STREET  
ROMEOVILLE, IL

VALERIE FARRELL & JOSEPH WESLOK  
OF DYNALAM ARRIVE AT 12:50 P.M.

WEATHER: SUNNY ~45°F

WAITING FOR ARRIVAL OF FACILITY REPRESENTATIVE.

- FACILITY BOUNDARIES

- NORTH: 135<sup>TH</sup> STREET FOLLOWED BY A  
CONVERGENCE IN DES PLAINES R.

- EAST & WEST: FORKS OF DES PLAINES R.

- SOUTH: RESIDENCE

- FACILITY IS ~6 FEET ABOVE WATER LEVEL

- COMMONWEALTH EDISON POWER PLANT W/  
LARGE COAL PILE ON EAST SIDE OF  
RIVER

- FOREST PRESERVE: MUSEUM WEST OF RIVER.

- APPROXIMATELY 80-95 DRUMS IN FRONT  
OF BUILDING

- APPEAR MOSTLY EMPTY, BUNGS AND  
LIDS OPEN ON MANY

- ACCORDING TO LABELS ON DRUMS,  
FORMERLY CONTAINED FOLLOWING

2-Y-93

(40-Y5) - FLISHTMAN'S YEAST

(8) - G.W. GALLOWAY DAIRY PRODUCTS

(20) - "CONCENTRATED SODIUM"

(2) - "FOOD PARTICULATE ADHESIVE"

(2) - UNUSABLE

(2) - ISO PROPNOL

1:05 p. CLIFFORD DONALD ARRIVED ON-SITE.

- HE HAS OWNED PROPERTY SINCE ~ 1973

- NO OTHER EMPLOYEES

- MR. DONALD UNLOCKED THE BUILDING

HE CALLED IT "POLE BUILDING"

- ASKED GENERAL NATURE OF OPERATIONS

- PURCHASED IN 1973 - WAS A HOTEL

RESTAURANT - THE BECAUSE OPERATIONS

IN THE ~~BUILDING~~ IN FORMER

BUILDINGS (OLD HOTEL)

- OPERATIONS INVOLVED WASHING DRUMS

IN 15' x 3' WASH BATH. WATER

FROM BATH; RINSE WATER WAS

DITCHED VIA A FLOOD DRAIN

TO A DIRT PIT ON SOUTH SIDE

OF BUILDING. (CAPACITY ~ 5 DUMPS)

- USED HYDRAULIC SOLUTION IN WASH

1974

24

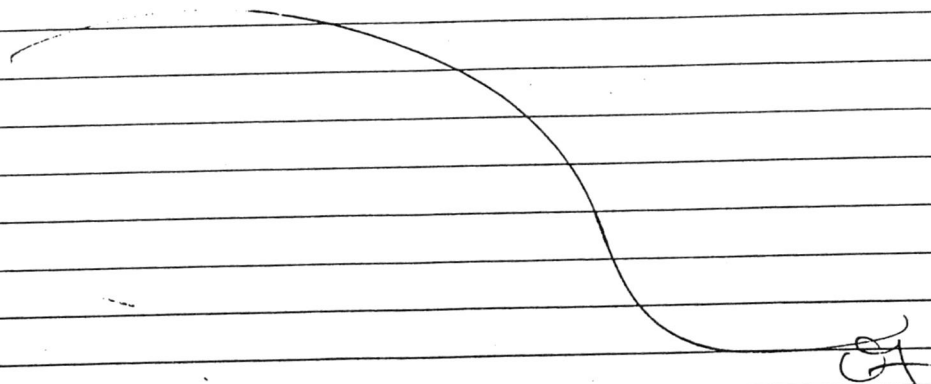
105



# PHOTOS

2-4-93

PHOTO #	DIR.	
1	NW	- ~40 FLEISHMAN'S YEAST DRUMS
2	E	- WASH BATH INSIDE POLE BUILDING.
3	E	- AREA WHERE DIRT PIT WAS LOCATED; USTs ARE NOW LOCATED
4	S	- POLE BUILDING AND FRONT DRUM STORAGE AREA
5	SE	- TRUCK WITH DRUMS FROM OFF-SITE CUSTOMERS.
6	NW	DRUMS AND MISCELLANEOUS DEBRIS <del>FROM</del> IN REAR STORAGE AREA
7 & 8	NW/W	- RUN-OFF TRENCH THAT DRAINS ALL SURFACE WATER AT FACILITY TO RIVER.



2-4-93

- MR. DORION DOES NOT RECALL SPECIFIC DATES (OF OPERATIONS AND PROCESSES)
- INSTALLED 2 USTS IN LATE 1970S - FOR RINSE <sup>WATER</sup>
- OLD HOTEL BUILDING BURNT DOWN IN ~1977
- BUILT CURRENT BUILDING IN ~1978
- CONTINUED RINSING, WASHING OPERATIONS
- NOW WATER (RINSE WATER) IS DISCHARGED VIA A FLOOR DRAIN TO 2 INTER-CONNECTED 500 GALLON USTS.
- USTS ARE CONNECTED TO A PIPE THAT DISCHARGES TO RIVER ON WEST SIDE OF FACILITY.
- THEY WERE INSTALLED IN SAME AREA AS DIET PIT ON SOUTH SIDE OF FACILITY.
- MR. DORION STATED THAT HE COLLECTED RESIDUALS FROM DRUMS (THAT HE THOUGHT MIGHT BURN)
- HE COLLECTED RESIDUALS IN A BUCKET - MIXED IT W/ DIESEL AND BURNED IT IN FURNACE TO HEAT BUILDING
- DOES NOT KNOW DATES THAT FURNACE WAS USED - MAYBE 1978 START BUT DOES NOT KNOW WHEN STOPPED.
- MR. DORION DOES NOT KEEP ANY RECORDS -
- NEVER CONDUCTED A WASTE ANALYSIS



2-4-93

- MR. DORION SAID THAT HE NEVER CHANGED WASTEWATER IN WASH BATH. JUST ADDED CAUSTIC SOLUTION AND WATER AS NEEDED.
- WHEN HE STOPPED RINGING DRUMS (UNKNOWN DATE) HE DUMPED CONTENTS OF TANK TO USTS VIA FLOOR DRAIN.
- THEREFORE, WENT DIRECTLY TO RIVER.
- SAID ENTIRE BUILDING HAS BEEN FLOODED IN PAST.
- IN ~1985 MR. DORION CHANGED NAME TO PKG CONTAINER CORP. BECAUSE CLIFF'S SOUNDED TOO SMALL
- CURRENTLY ONLY BUYS & SELLS "CLEAN" EMPTY DRUMS" DOES NOT CONDUCT ANY WASHING OR RINSING
- MOSTLY ACCEPTS FOOD PRODUCTS DRUMS
  - VINEGAR
  - DAIRY PRODUCTS
  - MOLASSES
  - BAKERY PRODUCTS
  - JUICES
  - FEW SOLVENTS TOO.

55

55



2-4-93

- HAS ONE WELL ON SITE FOR INDUSTRIAL WATER - ~80 FEET DEEP.
- CLOSEST WELL ~200 FEET WEST.  
~200 FEET DEEP.
- HAD SPECIAL WASTE HANDLE PERMIT  
# 0635/001 EXP. 12-31-88
- "SOMEONE TOLD HIM "GET IT"  
"BUT HE DID NOT SHIP HAZARDOUS  
WASTE"
- NEVER REMOVED WASTE FROM UST'S.
- NO FENCE OR SECURITY "ALST LOCKED  
BUILDING.
- RESIDENCE SOUTH OF FACILITY (~300 FT)
- LEFT FACILITY ~2:35 P.

Value  
Low